

**In The United States District Court For Southern District of New York**

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Annamarie Trombetta,

Civil Action No. 18-cv-0993-RA-HBP

Plaintiff,  
vs.

**PLAINTIFF’S REPLY TO DEFENDANT  
ESTATE AUCTIONS INC’S OPPOSITION  
TO PLAINTIFF’S MOTION TO CORRECT  
AND RECONSIDER PLAINTIFF’S  
EXPERT WITNESS REPORTS**

Norb Novocin, Marie Novocin,  
Estate Auctions Inc.

and

WorthPoint Corporation  
Defendants

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Pro se Plaintiff’s Reply to Estate Auctions Inc Opposition to Plaintiff’s Motion to Correct or Reconsider Judge Cave’s Order is filed to once again address Judge Cave’s quotes and decisions in Order in ECF 509, filed on June 22, 2023. Judge Cave wrote “*Ms. Trombetta ..... neither requested an extension of the **Dec. 19, 2022** deadline nor gave any indication that she might not meet it due to her experts’ unavailability or for any other reasons.*” In Plaintiff’s July 6, 2022 Motion to the Court to Correct or Reconsideration Judge Cave’s Decision, Plaintiff noted quintessential dates and requests not mentioned and therefore not considered in Judge Cave’s Decision. My filings took place before and after Dec. 19, 2022. In EAI’s ECF 525 page 3 Mr. Duff wrote **I .Plaintiff Does Not Meet the Standard for Reconsideration noted in accordance with Local Civil Rule 6.3 and Federal Rule of Civil Procedure 60(b), ”the need to correct clear error or prevent manifest injustice,”** Plaintiff states the clear mistakes that caused judicial injustice based on incorrect facts that meet the standard for Reconsideration. Below are five reasons with docketed evidence to support my Motion.

- 1) The First date, Nov. 23, 2022 in **ECF 329**, documents Plaintiff asking Judge Cave for permission to submit an application to extend time for my expert witnesses on page 64. Plaintiff’s application request was granted during the Nov. 23, 2022 call.
- 2) The Second date, Dec. 8, 2022 in **ECF 330** is the actual request for an extension of

time Plaintiff filed the transcript **page 64** as EX. #3 as proof. Plaintiff filed this request due to the fact that my expert witness, Gayle Skluzacek, was on a project that she hoped to finish. but on Dec. 6, 2022, informed Plaintiff by email she could not complete and write her report until Jan. 2023 due to prior work commitments. In addition, Plaintiff's internet expert witness, Patrick O'Leary, on Dec. 5, 2022 spent time to write an extensive affidavit on Defendants production of four eBay receipts for the ONE alleged sale of the 1972 oil painting allegedly sold on eBay. Mr. O'Leary urgently deciphered and accessed all FOUR of Defendants eBay receipts and saw that each one was different in some way from each other. It was ONE sale. Each of the four eBay receipts should look the same and have the same text and visual icons. The four eBay receipts produced by the Defendants are not visual the same. **SEE EX.**

**#1 -April 27, 2022 - EAI 58-59 EX.#2 Nov. 16 2022 - EAI 60 EX.#3 Dec. 2022**

**EX.#4 -Dec 2022-EAI 65-66 Also See ECF -320 filed on Dec. 1, 2022—**

On Dec 11th and Dec, 12, 2022, I emailed and phoned Chambers as I was unable to stand upright to file my Second Amended Complaint. On Dec.12, 2022, in **ECF 332** Judge Cave noted I contacted her chambers due to ill health. On Dec. 12, 2022 in **ECF 333**, Judge Cave granted me a one week extension despite Ms Skluzacek's unavailability until Jan 2023 and my noted illness on Dec.11, 2022.

- 3) The Third date, Dec. 16, 2022 in **ECF 338** was Plaintiff's second request for an extension of time due to the fact that all my experts need more time. Plaintiff from Dec. 7th to Dec. 12th was fighting the onset of the flu and ill health, due to the extreme stress and unending constant, demands of this case I also had the WorthPoint's lawsuit in Georgia for Intentional Infliction of Emotional Distress. As a Pro Se litigant, the two Defendants in this case and the addition of the improperly

served lawsuit in Georgia, demanded more time and energy than Plaintiff had to complete each filing in New York and in Georgia. I was experiencing complete mental and physical exhaustion .

### **PLAINTIFF’S REQUEST TO SUBMIT REPORT AFTER DEC. 19, 2022**

- 4) After Dec. 19, 2022, on Jan. 23, 2023, I filed **ECF 359** requesting reconsideration to submit my expert reports. In ECF 359 Plaintiff directly requested Judge Cave to reconsider the submission of my expert witness reports. Plaintiff did not see noted in ECF 509 Judge Cave’s acknowledgement of my Jan. 2023 request in ECF 359.

Judge Cave’s Opinion and Order filed on June 22, 2023 on Page 14 of ECF 509 states :  
*“When the Court instructed her that “[j]ust forwarding their resumes is not sufficient,” Ms. Trombetta acknowledged that she “[u]nderstood,” and neither requested an extension of the December 19, 2022 deadline nor gave any indication that she might not meet it due to her experts’ unavailability or for any other reason. (Id. at 42)*

On page 14 of ECF 509, Judge Cave’s did **NOT** name, mention, comment on Plaintiff’s reconsider for an extension for my expert witness. written in **ECF 359** filed on **Jan. 23, 2023**, to the Court. I made a three specific requests-No 3) is Plaintiff’s seeking Reconsideration to Submit Plaintiff’s Expert Witness Reports. Defendants in 2023, emailed Plaintiff requesting dates to schedule expert witness depositions. On Feb. 1, 2023 Plaintiff emailed Defendants requests to my experts to find out when I can expect their reports. I asked my experts when they would be available for depositions see in ECF 522-2 on Page 17. In addition, on **On Feb. 1, 2023** in **ECF 364**. Judge Cave issued an order stating “ The expert discovery deadline was extended to Wednesday March 1, 2023”. On **Feb. 2, 2023**, Plaintiff filed **ECF 365.-Question RE Expert Reports.** In **ECF 366**, also on **Feb. 2, 2023**, Judge Cave granted my Second Amended Complaint. On Feb. 3, 2023, in **ECF 367**, Judge Cave issued another Order. In ECF 367 Judge Cave wrote Judge Ronnie Abrams will determine all witnesses that may be

called at trial. Pro Se Plaintiff re read FRCP 26(a) (2), which clearly stated :

” Fed. R. Civ. P. 26(a)(2)(B), (a)(3)(B), (a)(4) : A party who fails to make the disclosures required under Rule 26(a)(2)(B) “ is **not** allowed to use that information or witness to supply evidence on a motion, at a hearing, or at trial. Pro Se Plaintiff surmised , in order for my experts to qualify to give testimony at trial, Plaintiff needed to submit and disclose my experts opinions and reports. I emailed Dr. Scelsa’ expert report to Defendants on Feb. 16, 2023. On Feb. 23, 2023. I emailed Gayle Skluzacek ’s expert report to Defendants noted in Plaintiff filing on Feb.23, 2023 in **ECF 376** which is a letter to Judge Abrams and Judge Cave informing Judge Cave why my expert witnesses reports were delayed and that I submitted both expert reports to Defendants. In summary Plaintiff ’s Motion to reconsider **ECF 522** is also based on my reconsideration request for expert reports in ECF 359 on Jan. 23, 2023 made AFTER Dec. 19, 2022 and Judge Cave’s extension for expert discovery till March 1, 2023, in ECF 364. Plaintiff filed ECF 522 for all the reasons and past filings stated above.

5) Lastly, in ECF 509 Judge Cave has a significant written mistake regarding the date when WorthPoint served Plaintiff . The date was **August 30, 2022**. Judge Cave on page 11 **incorrectly** wrote I was served in **July** 2022 and then wrote “ *WorthPoint correctly points out, however, that Ms. Trombetta fails to account for the months of October, November, and December 2022,* which “afforded an opportunity to confer with her experts and produce an appropriate disclosure.” (ECF No. 499 at 1). The lawsuit in Georgia required a response at the end of Sept.2022. At the same time in New York, I had to respond to WorthPoint’s deposition and Rule 37 demands. In Sept WotrthPoint’s attorneys sent emails that had Gmail warnings. These emails caused my computer to freeze I could not shut my computer off. In Oct 2022 WorthPoint deposed my three fact witnesses yet never sent a subpoena to one, creating delays. On Oct 31, 2022, the New York attorneys filed false claims to extend discovery. On the same day, in Georgia, WorthPoint’s lawyer filed a Motion for Default Judgement and require me to file an

immediate response. The lawyer in Georgia 's Motion was filed on Oct 31, 2022 yet wrote an incorrect date claiming on Nov. 5, 2022, I responded to the complaint, which is a self evident mistake -**EX. #5 WP Georgia Lawsuit**. Plaintiff and my expert witness can affirm, if I was not served a summons and complaint in Georgia from WorthPoint Corp and Will Seippel Plaintiff would have been able to timely complete my expert witness reports. Given the opportunity, all three of my expert witness will affirm I had to cancel or postpone my appointments with them Annexed are the self evident incorrect dates on each of one of WorthPoint's Georgia filings. **EX.#6 A-B-C**

### **PRELIMINARY STATEMENT**

Plaintiff brings to the Court's attention my pursuits back in January 2017 to contact Norb and Marie Novocin to inform them that I am not the artist who painting the 1972 oil painting "Man With Red Umbrella" which is NOT signed Annamarie Trombetta. The 1972 oil painting, based on the photos on WorthPoint's website, is signed on the front as "A." Trombetta" ( In my opinion the "A" looks more like the letter " Y " than the letter "A"). The signature in red pencil photos produced by EAI Defendants in April 2022, allegedly on the back the 1972 oil painting is spelled differently in three relevant ways than my name. The red pencil signature was also NOT the same spelling as in the 1972 eBay ad on WorthPoint's website. My first name is Annamarie ending in "E" not in the letter "A". Plaintiff does not separate the two names or capitalize the M in Marie. In the false 1972 ad, created by Norb Novocin, my name is spelled correctly, as one word yet the red pencil signature on the back is not. WorthPoint's caption in the expansion of the photo signature ( A. Trombetta) states in writing the 1972 oil was "*signed Annamarie Trombetta*" yet the photo depicted "A. Trombetta" EX. #5. The Novocins/ EAI Defendants ' production of both signatures verifies that neither of the signatures on the 1972 oil painting that Norb Novocin titled "Man With Red Umbrella" is

spelled Annamarie Trombetta. Moreover , Plaintiff has produced my print and signature from 1972 which is from my childhood notebook , I was a Girl Scout. Annexed is an authenticated photo of my Girl Scout sash with “Greater New York —Brooklyn patches and also features the Housekeeping Girl Scout’s Badge that is next to Plaintiff’s 1972 signature and print.

Photo of Sash.Signature and Badge. See **EX. #7** . I have also annexed in **EX #8** the WorthPoint website “A.Trombetta” signature and the red pencil signature on the back canvas as **EX. # 9**.

On Jan. 2017 Norb Novocin phoned Plaintiff and on page 3 Mr. Novocin stated “ *There are lots of paintings out there without a provenance and so what we stated this* *We didn’t even state it was by you. We just stated it was SIGNED Annamarie Trombetta*” Plaintiff responded “ *Right and that’s fraud, sir.* Norb Novocin asked “*Why is that Fraud?*” Plaintiff directly informed Mr. Novocin in 2017 “ *I did not do that painting*”. Despite my affirmation, Mr. Novocin stated “ *If you want to acquire an attorney and go for stuff Go for it. But we have done nothing illegal or wrong* “. **EX.# 10 Novocin call.**

Fraud becomes a crime when it is a “knowing misrepresentation of the truth or concealment of a material fact to induce another to act to his or her detriment”. In Plaintiff ‘s 2015 eBay phone transcript, eBay specialist, Archer on page 19 deemed the 1972 oil painting as an “Undefined” eBay sale. **EX. #11-page 19**. In Jan. 2017, the phone transcript with Norb Novocin, documented I informed Defendant, I did not paint the 1972 oil painting and that this was Fraud. Both Defendants failed from 2017 and throughout discovery to produce the listed 12 photos, or to produce any webpage or meta data for the 1972 ad. Defendants failed to identify, name or locate the artist who painted “Man With Red Umbrella” and moreover who signed the forged signatures on the 1972 oil painting. The absence of this evidence I requested conjoined with the failure by EAI to produce one native electronic email for the alleged 1972 oil painting eBay sale, contributes to Plaintiff’s claim for Fraud, Intentional Infliction of Emotional Distress and my request for Permanent Injunctive Relief. Plaintiff present facts to

the Court's to consider and determination include my diligent pursuits for eight years. The elements to determine and prove my claim for Fraud are in ECF 348. All facts produce and not produced are relative to calculate the extent of the Fraud claim and extent of the crime.

## **DEFENDANTS DECEIT SUPPORT "S PLAINTIFF'S ECF 522 MOTION**

I begin with Mr. Duff's written comments on page 4 of ECF 525 under —

**II. Plaintiff's Argument that this Lawsuit was Too Stressful Between the February and September 2022 for Her to Timely Serve Expert Disclosures Has Already Been Addressed by the Court.** Mr Duff stated *"Plaintiff argues that this lawsuit, which she initiated, has been too stressful for her to serve her expert disclosures in a timely fashion despite having received extensions of that deadline "*. Mr. Duff mistakenly noted I had to (iii) prepare for her deposition and respond to a summons and complaint filed against Plaintiff in Georgia in **July 2022**; and (iv) try to access emails Defendants produced in September 2022, all resulted in "emotional trauma." (June 22, 2023 Order, ECF No. 509 at 11; Pl.'s June 1, 2023 Letter, ECF No. 493 at 1-2.)

First, Plaintiff was served a summons and complaint from Georgia on August 30, 2022 **NOT July 2022**. Plaintiff's FIRST request for an expert report extension was on Dec. 8, 2022, due to the unavailability of my experts. I contracted the flu due to being overworked and stressed. The Novocins admit photographing, and /or circulating a false signature "A. Trombetta", publicly, on the internet, which is not mine. I note that in May 2023, Judge Cave ordered Plaintiff to write a Fourth Settlement Letter. Despite Mr. Duff's own baste stamped evidence in EAI00001-to 3, **EX. #12**. Mr. Duff emailed me to forward him the 2017 settlement offer I sent to The Novocins prior to litigation. Mr. Duff is not aware of his own evidence and the facts in this case. Moreover, EAI nor WorthPoint did not make a counter offer to settle this case in May 2023. Despite informing both Defendants before litigation it was NOT my painting, each one has attempted, during this lawsuit to further exploit Plaintiff monetarily. In 2020 EAI

filed a Motion to post a \$20,000 bond against me. One year earlier in 2019 they offered a sum no more than the first three numbers as a settlement offer. WorthPoint filed a lawsuit in Georgia for over \$120,000 yet the complaint incorrectly states incorrect does in the complaint. In short the date of Jan. 2020, should be the year 2021, aside from the fact I was ordered by Judge Abrams to serve Mr. Seippel at his residence. I add that in Sept. 21, 2022, WorthPoint's attorneys questioned Mr. Novocin and informed him EAI000058 was cut off on the right side and labeled it as Exhibit #4. Plaintiff has annexed Norb Novocin Deposition Exhibit #4 pages 72 to 77 and as **EX.#13**. On Oct. 28th and Oct. 31 2022. I emailed Mr. Duff and requested the full uncut version eBay sale receipt It was produce on Nov. 16, 2022.

Mr. Duff states in **III. Plaintiff Provides No Credible Reason Why She Could Not Work on Expert Disclosures During October and November 2022** on page 5 of ECF 525. Plaintiff affirms if I was NOT served a summons and complaint on August 30, 2022, albeit improperly, after a nine hour deposition, I would have had time to submit my expert reports. The Georgia summons was issued on June 16, 2022. Defendants strategically inflicted another lawsuit from another state, with different laws/rules which required an immediate response. At the end of Sept and early Oct, 2022 Plaintiff had to respond to the lawsuit in Georgia by WorthPoint. I add, my three fact witnesses were deposed in Oct. Due to WorthPoint's attorneys, one of my witnesses never received her subpoena on time, creating more confusion and delays. Also due was my 300 page deposition, on Oct. 20, 2022, and need to be corrected with responses—see ECF 522 attach.#7. I had to respond to deposition exhibits that WorthPoint's attorneys failed to send, creating more work for me. I had to respond to WorthPoint's rule 37 demands due at the same time. In Nov. Defendants noted in ECF 309" Plaintiff produced hundreds of pages of documents" WorthPoint's attorneys admit they did NOT review them, yet filed a letter with the Court. In ECF 522-Attach. #6 I had filed ECF 310 on Nov. 8, 2022 I had to correct Defendants false claims and self evident mistakes. On Nov 7th and 23.2022 requested



the Feb 20, 2016 electronic email I sent Oct. 28, 2022- see in ECF 522- EX.#9 . On Oct, 31, 2020 the attorney in Georgia filed the Motion for Default and incorrectly wrote I filed my response on Nov. 5, 2020. On Nov. 16, 2022 Plaintiff had to file ECF 315 as Ordered by Judge Cave on Discovery. On Nov. 16th I emailed Mr. Duff and he finally produce EAI000060 with his email-See in **EX.#14**. On Nov. 17, 2022 Mr. Bialek emailed me about a Sept. 21, 2022 eml. that he claims Mr. Duff sent to me. On Nov. 18, 2022, I emailed all that attorneys and asked why no one said anything until Mr. Duff produce his Nov. 16, 2022 eBay receipt without the eBay bold yellow bar-see **EX. #15** . The constant confusion would alter any well balanced person, who has been subjected to eight years of continuous, self evident deceit, gaslighting and manipulation, to experience emotional distress. I have been bombarded with contradictory statements and self evident lies. I lost a great deal of time and money yet had nothing to do with the painting. Plaintiff is the only listed artist with my name not only in New York, I am the only artist with my name on the internet which I have conveyed during my August Deposition.

I address next, Mr. Duff's false and cruel statements in **IV. Plaintiff Disingenuously Argues that She was Too Sick to Timely Serve Expert Reports During December 2022 and January 2023**. Plaintiff doctor will furnish the Court with my medical records . Again I restate in on page 64 of the Nov 23,2022 transcript I asked for an extension. I was aware my two experts might need time. hence my request made to Judge Cave on Nov. 23, 2022.

I note Mr. Duff's disingenuous comment and bring the Court's attention in Jan 2017. Plaintiff had a collector of mine phone EAI to inquire about the 1972 online ad and painting on WorthPoint's website. EAI suggested Ms. Meissner send EAI an email about the 1972 painting. When EAI failed to send a written response to Ms. Meissner, on Jan. 10, 2022 I phoned EAI's public phone number. I informed Marie Novocin the painting is not mine asked why she did not respond to Ms. Meissner's email. I asked if she knew why the 1972 ad was on the internet.

Bate stamped as EAI000063 in **EX.16A** is the meta data from Ms. Meissner's Jan. 2017 email produced by Mr. Duff in Nov, 2022. The meta data from Ms. Meissner's Jan. 6, 2017 email to EAI does NOT have a black background, the information and coding is NOT cut off and is legible. I now bring to the Court's attention, **ECF 334**, filed on Dec. 13, 2022 by Mr. Duff in EAI00073--79 **EX. 16 B**. It is supposed to be the Meta Data for the 1972 eBay sale. Oddly, the background is in black and evident the text is cut off and truncated as EAI000058. I have Annexed internet expert Mr. O'Leary opinions on EAI00073--79 meta data - **EX. 17**.

Last, I must address Mr. Duff's comment in the Conclusion portion of his Memorandum *"Plaintiff's lawsuit continues to prevent a bankruptcy proceeding filed by Defendants Norb and Marie from moving forward. Every delay caused by Plaintiff inflicts additional hardship on Norb and Marie."* On Feb. 1, 2022, Mr. Duff stated the exact quote. Upon Defendant's request I wrote my a settlement letter which they falsely claimed did not have a monetary amount. I then wrote another letter. In ECF 209 I issued a Declaration. In ECF 214 Defendants canceled Settlement Conference. As I noted in May 2023 I to write a settlement and state I welcomed Defendants to make a counter offer. Mr. Duff's requested proof of my 2017 settlement letter he already had in his own evidence. I end with pages from Marie Novocin who admits she never saw the 1972 painting, . Norb Novocin claims to this day he never visited my website—yet used my biography. These people caused me to lose eight years of my life, thousands of dollars and I lost countless careers opportunities. Plaintiff made the effort for eight years to comply, write settlement letters etc. The Novoicns chose to be deposed and not settle this case. I have annexed pages from their depositions **EX.#18** and In **EX. #19** I filed an email and electronically meta data of Mr. Duff's Nov.23, 2022 email - Increased Attorney fees.

## CONCLUSION

Plaintiff requests the Honorable Chief Judge Swain 's reconsideration of the inclusion of my expert witness reports and my expert witnesses giving testimony at a potential trial.

Annamarie Trombetta  
175 East 96th Street (12 R)  
New York. New York 10128

Pro Se Plaintiff

Respectfully Submitted ,  
——Electronic Signature ——

/s/ Annamarie Trombetta August 1, 2023

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Annamarie Trombetta Pro Se Plaintiff

# EXHIBITS

## TO PLAINTIFF'S REPLY TO ESTATE AUCTION INC. OPPOSITION TO PLAINTIFF'S MOTION TO RECONSIDER

**EXHIBIT # 1** EAI April 27, 2022 eBay sales receipt cut off on right side EAI000058-59.

**EXHIBIT # 2A** EAI Second eBay receipt was produced Nov. 16, 2022 as EAI000060

**# 2B** Mr. Duff's email Nov. 16, 2022 with eBay receipt as EAI000060

**EXHIBIT # 3** EAI Third eBay receipt -Nov, 23, 2022 email code

**EXHIBIT # 4** EAI no Visual Icons or Colors-Cut and Paste Text-EAI000065-66

**EXHIBIT # 5** A Wilson Elser Process Server Affidavit Sept 1, 2022 -Georgia Lawsuit  
B Affidavit of Wanda Buncamper—Phone Call —

**EXHIBIT #6** A August 30, 2022 Georgia Summons Complaint wrong year —Jan 2022  
B Oct. 31, 2022 Motion for Default Judgement -Mistake Nov. 5, 2022  
C June 29, 2022 Proposed Order with Future Aug. 20 2023 and Sept 29, 2023

**EXHIBIT # 7** Plaintiff's 1972 print and script signature & Girls Scout Sash with Badge.

**EXHIBIT # 8** WorthPoint website photo of false "A.Trombetta" signature Pl. Evid 000163

**EXHIBIT # 9** Red pencil dissimilar signature on the back of the 1972 oil painting

**EXHIBIT # 10** Phone Transcript Norb Novocin 5 pages

**EXHIBIT # 11** EBay Phone Call eBay 1972 oil painting "Undefined"

**EXHIBIT # 12** Mr. Duff email to forward him the 2017 settlement offer-EAI00001-to 03

**EXHIBIT # 13** Norb Novocin Sept 21, 2022 Deposition pages 72 to 77 with Depo Exhibit #4

**EXHIBIT # 14** Nov. 16, 2022 email Anderson Duff RE the eBay receipt EAI000060

**EXHIBIT # 15** Plaintiff Nov. 18, 2022 email to All Attorney regarding the eBay receipt.

**EXHIBIT #16** A Bate Stamped EAI000063 Jan. 6, 2017 Email Meta Data to EAI

**EXHIBIT #16B** Bate Stamped EAI000073-74 alleged 1972 eBay EAI email Meta Data

**EXHIBIT #17** Internet Expert Patrick O'Leary's Deposition p 132-136 on EAI000073-79

**EXHIBIT #18** Deposition pages of Norb and Marie Novocin on Sept. 21, 2022.

**EXHIBIT #19** Mr. Duff's Nov.23, 2022 Increased Attorney fees Electronic native email

**In The United States District Court For Southern District of New York**

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Annamarie Trombetta,

vs.

Norb Novocin, Marie Novocin,  
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**CERTIFICATE OF SERVICE**

I certify that on August 1, 2023, a true and correct copy of the foregoing Plaintiff's Reply to Estate Auctions Inc Memorandum of Law in Opposition to Plaintiff Motion to Reconsider Expert Reports. The document was served upon the parties of record via the Court's CM/ECF system and directly to all attorneys listed below to include attorney Anderson Duff, representing Marie and Norb Novocin and Estate Auctions Inc and Adam Bialek, Jana Farmer and John Cahill attorneys for WorthPoint Corporation and representing .

Dated: New York, New York August 1, 2023

Submitted by

Annamarie Trombetta  
175 East 96th Street (12 R)  
New York. New York 10128

——Electronic Signature ——

/s/ Annamarie Trombetta August 1, 2023

Pro Se Plaintiff

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Annamarie Trombetta Pro Se Plaintiff

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